

**EXHIBIT 6-C**

**City of Detroit's Identification of Witnesses in Response to Syncora's  
Notice of Rule 30(b)(6) Deposition**



**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re	)	
	)	
	)	Chapter 9
CITY OF DETROIT, MICHIGAN	)	
	)	Case No.: 13-53846
Debtor.	)	
	)	Hon. Steven W. Rhodes
	)	
	)	
	)	

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**CITY OF DETROIT'S IDENTIFICATION OF WITNESSES  
IN RESPONSE TO SYNCORA'S NOTICE OF DEPOSITION  
FILED PURSUANT TO FED. R. CIV. P. 30(b)(6)**

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**DEPOSITION TOPIC NO. 1:**

The historical causes of the City's financial instability and bankruptcy filing.

**RESPONSE:**

After a meet-and-confer with the City, Syncora agreed to withdraw this topic.

**DEPOSITION TOPIC NO. 2:**

The City's tax policy, taxing capabilities, tax revenue assumptions/projections, and any studies regarding the foregoing.

**RESPONSE:**

The City identifies Mr. Robert Cline for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 3:**

The anticipated cost and time to judgment of the COP Litigation.



**RESPONSE:**

After a meet-and-confer with the City, Syncora further articulated this topic and the City agreed to designate Mr. Kevyn Orr for the further refined topic.

**DEPOSITION TOPIC NO. 4:**

The authority of the City to terminate retirees' other post-employment benefits, the value of those benefits, and the value of any replacement benefits obtained by retirees under the Plan of Adjustment.

**RESPONSE:**

After a meet-and-confer with the City, Syncora further articulated this topic and the City agreed to designate Ms. Sue Taranto for the further refined topic.

**DEPOSITION TOPIC NO. 5:**

The enforcement remedies available to the City's creditors had the City not filed for bankruptcy.

**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 6:**

The ability of the City to pay judgments obtained by its creditors pursuant to the Revised Judicature Act of 1961.

**RESPONSE:**

The City identifies Mr. Robert Cline for purposes of its Rule 30(b)(6) deposition.



**DEPOSITION TOPIC NO. 7:**

Any judgments obtained by the City's creditors pursuant to the Revised Judicature Act of 1961 from 1980 to the present.

**RESPONSE:**

The City identifies Mr. John Hill for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 8:**

The value contributed to the City's Chapter 9 reorganization by classes 10, 11, and 12 of the Plan of Adjustment.

**RESPONSE:**

After a meet-and-confer with the City, Syncora further articulated this topic and the City agreed to designate Mr. Kevyn Orr with respect to the non-financial value of the topic and Mr. Gaurav Malhotra with respect to the financial value of the topic as further articulated by Syncora.

**DEPOSITION TOPIC NO. 9:**

The value received by classes 10, 11, and 12 under the Plan of Adjustment.

**RESPONSE:**

After a meet-and-confer with the City, Syncora further articulated this topic and the City agreed to designate Mr. Kevyn Orr with respect to the non-financial value of the topic and Mr. Gaurav Malhotra with respect to the financial value of the topic as further articulated by Syncora.



**DEPOSITION TOPIC NO. 10:**

The value and risks associated with the New B Notes.

**RESPONSE:**

The City identifies Mr. Ken Buckfire for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 11:**

The assistance that the state of Michigan provided to the City to counteract the City's financial instability and economic decline.

**RESPONSE:**

The City identifies Mr. Ken Buckfire for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 12:**

Any and all documents that the Detroit Institute of Arts provided to the City between January 1, 2013 and the present.

**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 13:**

Any limitations, restrictions, or encumbrances on the pieces of art in the Collection.

**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.



**DEPOSITION TOPIC NO. 14:**

Any efforts to monetize the Collection, or any of the pieces of art in the Collection.

**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 15:**

The funds that the City received from the state of Michigan from January 1, 2001 to present.

**RESPONSE:**

The City identifies Mr. Robert Cline for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 16:**

The funds that the City anticipates it will receive from the state of Michigan in the future.

**RESPONSE:**

The City identifies Mr. Robert Cline for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 17:**

The funds that the City received from the federal government from January 1, 2001 to present.

**RESPONSE:**

The City identifies Mr. John Hill for purposes of its Rule 30(b)(6) deposition.



**DEPOSITION TOPIC NO. 18:**

The funds that the City anticipates it will receive from the federal government in the future.

**RESPONSE:**

The City identifies Mr. John Hill for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 19:**

The funds that the City anticipates it will receive from private foundations in the future.

**RESPONSE:**

The City identifies Mr. Gaurav Malhotra for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 20:**

The City's calculation of the aggregate allowed other postemployment benefits claims.

**RESPONSE:**

The City identifies Ms. Suzanne Taranto for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 21:**

The City's efforts to collect delinquent income and property taxes owed to the City.

**RESPONSE:**

The City identifies Mr. John Hill for purposes of its Rule 30(b)(6) deposition.



**DEPOSITION TOPIC NO. 22:**

The City's efforts to monetize its real estate.

**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 23:**

The ability of the City to increase taxes or levy additional taxes.

**RESPONSE:**

The City identifies Mr. Robert Cline for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 24:**

The municipal services that the City considers essential and necessary to the operation of the City.

**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 25:**

The powers of the Emergency Manager under PA 436, and the Emergency Manager's willingness to exercise, and actual exercise of, those powers.

**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.



**DEPOSITION TOPIC NO. 26:**

The City's plans to implement its Plan of Adjustment upon emergence from bankruptcy.

**RESPONSE:**

The City identifies Mayor Mike Duggan and City Council President Brenda Jones for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 27:**

All of the data and assumptions that the City utilized in creating its ten-year and forty-year projections in the Fourth Amended Disclosure Statement.

**RESPONSE:**

The City identifies Mr. Gaurav Malhotra for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 28:**

The basis for the City providing a higher percentage of recovery to holders of GRS pension claims and PFRS pension claims than to other holders of unsecured claims.

**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 29:**

The identity, location, and financial position of the City's retirees.

**RESPONSE:**

This topic is overbroad as to time and scope and is unduly burdensome. Additionally, this topic is not reasonably tailored to matters relevant to the trial on



the confirmation of the Plan of Adjustment. As set forth in the City's motion for entry of a protective order, this topic should be stricken.

**DEPOSITION TOPIC NO. 30:**

The City Planning Commission, the City Plan, and the Detroit Future City Strategic Framework.

**RESPONSE:**

After a meet-and-confer with the City, Syncora further articulated this topic and the City agreed to designate Mr. Charles Moore and Mayor Mike Duggan for the further refined topic.

**DEPOSITION TOPIC NO. 31:**

The OMB Circular A-133 Single Audit Report issued by KPMG for the year ended June 30, 2012 and efforts to address the issues identified within.

**RESPONSE:**

The City identifies Mr. John Hill for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 32:**

The history of the DIA and the Collection, the transfer of the Collection to the City, the Detroit Institute of Arts Operating Agreement, and the Collections Management Policy.

**RESPONSE:**

The City is continuing to evaluate whom it will identify for purposes of its Rule 30(b)(6) deposition.



**DEPOSITION TOPIC NO. 33:**

The status of the City's collective bargaining agreements and anticipated changes to them in the future.

**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 34:**

The status of any anticipated changes to the Detroit City Charter.

**RESPONSE:**

After a meet-and-confer with the City, Syncora further articulated this topic and the City agreed to designate Mr. Kevyn Orr and Mayor Mike Duggan for the further refined topic.

**DEPOSITION TOPIC NO. 35:**

The City's anticipated population levels by year implied by the City's 10-year and 40-year forecasts.

**RESPONSE:**

The City identifies Mr. Robert Cline for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 36:**

The ability of the City to pay its unsecured and/or outstanding obligations in the ordinary course if the City's bankruptcy case were dismissed.



**RESPONSE:**

The City identifies Mr. Gaurav Malhotra for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 37:**

The City's attempts to monetize its non-core assets.

**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 38:**

The City's restructuring and reinvestment initiatives.

**RESPONSE:**

The City identifies Mr. Charles Moore for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 39:**

All intended changes to the City's Assessor's Office, including its staffing levels, its methodologies and practices, its information technology, and the anticipated effects of those changes.

**RESPONSE:**

The City identifies Mr. Charles Moore and Ms. Beth Niblock, with respect to the information technology aspect of the question, for purposes of its Rule 30(b)(6) deposition.



**DEPOSITION TOPIC NO. 40:**

The City's Assessor's Office prior staffing levels, methodologies and practices, and information technology, and the effect of each on the City's Assessor's Office.

**RESPONSE:**

The City identifies Mr. Charles Moore and Ms. Beth Niblock, with respect to the information technology aspect of the question, for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 41:**

The procedure and protocol that the City utilized to identify, review, and produce documents responsive to *Syncora Capital Assurance Inc. and Syncora Guarantee Inc.'s First Request for the Production of Documents to the City of Detroit* [Doc. No. 3314].

**RESPONSE:**

The City refers Syncora to the Affidavit of Mary L. Hale (Dkt. No. 4944).

**DEPOSITION TOPIC NO. 42:**

The procedure and protocol that the City utilized to respond to *Syncora Capital Assurance Inc. and Syncora Guarantee Inc.'s First Set of Interrogatories to the City of Detroit* [Doc. No. 4036].

**RESPONSE:**

The City refers Syncora to the Affidavit of Mary L. Hale (Dkt. No. 4944).

**DEPOSITION TOPIC NO. 43:**

Any efforts to monetize Belle Isle, including the City's decision to enter into a lease with the state of Michigan and any alternatives that the City considered.



**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 44:**

The City's blight remediation and removal plan.

**RESPONSE:**

The City identifies Mayor Mike Duggan for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 45:**

The City's use of a 5% discount rate in the Plan of Adjustment and Fourth Amended Disclosure Statement.

**RESPONSE:**

After a meet-and-confer with the City, Syncora further articulated this topic and the City agreed to designate Mr. Ken Buckfire for the further refined topic.

**DEPOSITION TOPIC NO. 46:**

The City's determination of the size of the PFRS and GRS Pension Claims, and its decision to utilize a 6.75% discount rate to value liabilities and a 6.75% investment return rate.

**RESPONSE:**

The City identifies Mr. Alan Perry for purposes of its Rule 30(b)(6) deposition.



**DEPOSITION TOPIC NO. 47:**

The investment returns that the PFRS and the GRS will be seeking to obtain after the City emerges from bankruptcy.

**RESPONSE:**

The City identifies Mr. Alan Perry for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 48:**

All statements that the City contends were inaccurate in the offering circulars relating to the COPs.

**RESPONSE:**

After a meet-and-confer with the City, Syncora agreed to withdraw this topic.

**DEPOSITION TOPIC NO. 49:**

The factual background for the City's allegations regarding the malfeasance and past practices at the Retirement Systems, noted at pages 11-12 and 106-107 of the Fourth Amended Disclosure Statement.

**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 50:**

The City's communications with the Detroit Institute of Arts (including its employees, representatives, and counsel) relating to Attorney General Opinion No. 7272.



**RESPONSE:**

The City identifies Mr. Kevyn Orr for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 51:**

The terms of the settlements between the City and classes 10, 11, and 12 under the Plan of Adjustment.

**RESPONSE:**

The City identifies Mr. Charles Moore with respect to classes 10 and 11 and Ms. Suzanne Taranto with respect to class 12 for purposes of its Rule 30(b)(6) deposition.

**DEPOSITION TOPIC NO. 52:**

The City's efforts to obtain exit financing.

**RESPONSE:**

The City identifies Mr. Ken Buckfire for purposes of its Rule 30(b)(6) deposition.